

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THOMAS SIERRA,	)	
Plaintiff,	)	No. 18 C 3029
	)	
v.	)	Hon. John Z. Lee
	)	Hon. M. David Weisman
REYNALDO GUEVARA, <i>et al.</i> ,	)	
Defendants.	)	

**PARTIES' JOINT STATUS REPORT**

Pursuant to the Court's order (Dkt. 282), the parties in the above-captioned cases submit the following joint status report:

**A. Parties' Compromise Regarding Serial Depositions of 404(b) Witnesses**

1. The parties in this case, as well as the parties in each of the cases in which the plaintiff filed a motion to prevent serial depositions of Rule 404(b) witnesses (collectively, the "Motioned Cases") have reached an agreement. The cases subject to this agreement are as follows: *Sierra*, No. 18 C 3029; *Negron*, No. 18 C 2701; *Gomez*, No. 18 C 3335; *Rodriguez*, No. 18 C 7951; *Bouto*, No. 19 C 2441; *Iglesias*, No. 19 C 6508; *Johnson*, No. 20 C 4156, and *Almodovar*, No. 18 C 2341 (collectively, the "Cases").<sup>1</sup>

2. The parties have agreed to conduct a single deposition of each Rule 404(b) witness disclosed in more than one of the Cases, to be conducted under the supervision of this Court, as follows:

a. Each deposition may last up to eight hours if needed;

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<sup>1</sup> Counsel in *Almodovar* have agreed that plaintiff will provide advance notice if they intend to rely on any scheduled 404(b) witness in *Almodovar*. To the extent counsel for Almodovar seeks to disclose any overlapping witness for Almodovar's 404(b) purposes, Defendants have requested 14 days notice from Almodovar's counsel.

- b. The parties shall complete depositions of all of the 404(b) witnesses disclosed across multiple Cases by October 29, 2021.<sup>2</sup>

**B. Sierra Individual Case Fact Discovery Extension**

3. The parties have agreed to a deadline of August 27, 2021 to complete discovery in the individual case.

4. The parties anticipate that a separate *Monell* fact discovery deadline will need to be set.<sup>3</sup>

Dated: June 11, 2021

Respectfully submitted,

/s/ Anand Swaminathan

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Representative for  
Ernest Halvorsen,**

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<sup>2</sup> This is a deadline to complete the 404(b) depositions only. It does not implicate any other individual case, *Monell* or other fact discovery deadlines set by the Court in any of the Cases.

<sup>3</sup> The parties are not in a position to propose a deadline to complete fact discovery because of complications that have developed as a result of the subpoena to the Office of the Cook County Public Defender for its companion Investigative/RD files. *See Cook County Public Defender's Motion to Quash or Modify Subpoena, Solache v. Guevara*, 18 C 1028 (Dkt. 424).

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and Biebel**

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**For Defendant  
Guevara**

**CERTIFICATE OF SERVICE**

I, Anand Swaminathan, an attorney, certify that on June 11, 2021, I served a copy of the foregoing motion on all counsel of record through the Court's electronic filing system.

/s/ Anand Swaminathan  
*One of Plaintiff's Attorneys*